

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENNETH BERRYHILL,)	
)	
Plaintiff,)	Civil Action No.: 21-CV-4842
)	Judge:
v.)	Magistrate Judge:
)	
DAVID ERICKSON, INDIVIDUALLY)	NOTICE OF REMOVAL JURY
AND AS AGENT OF M.J. ELECTRIC, LLC,)	TRIAL DEMANDED
AND M.J. ELECTRIC, LLC)	
)	
Defendants.)	

NOTICE OF REMOVAL

NOW COME the above-named Defendants, David Erickson and M.J. Electric, LLC, by their attorneys, McCoy Leavitt Laskey LLC, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, and hereby give notice of removal of the above-captioned action from the Circuit Court of Cook County, State of Illinois, County Department, Law Division, to the United States District Court for the Northern District of Illinois – Eastern Division. In support of removal, Defendants allege and show to the Court as follows:

I. INTRODUCTION

1. On August 9, 2021, Plaintiff filed an action in the Circuit Court of Cook County, State of Illinois, County Department, Law Division, styled *Kenneth Berryhill v. David Erickson, Individually and as Agent of M.J. Electric, LLC and M.J. Electric, LLC*, and the case was assigned No. 2021L008021. A copy of the Complaint at Law is attached hereto as **Exhibit 1**.

2. This is a personal injury action in which the Plaintiff is claiming damages related to a motor vehicle accident that occurred on or about June 11, 2020 at or near the intersection of Haven Avenue and Honey Lane in the City of New Lenox, County of Will, State of Illinois.

Plaintiff alleges that Defendant David Erickson was negligent and caused the motor vehicle accident. The Complaint at Law further asserts that Erickson's employer, M.J. Electric, LLC, is vicariously liable for the actions of Mr. Erickson, who was an employee of M.J. Electric at the time of the accident. (**Ex. 1.**)

II. TIMELINESS OF REMOVAL

3. Plaintiff's counsel Michael Lapin provided a courtesy copy of the Complaint at Law to Counsel for Defendants on August 13, 2021 via email. A copy of the email attaching the courtesy copy of the Complaint at Law is attached hereto as **Exhibit 2**. M.J. Electric, LLC was served with the Summons and Complaint at Law on August 20, 2021. Upon information and belief, David Erickson has not yet been served with the Summons and Complaint at Law. Thirty (30) days from August 13, 2021, the date Defense counsel received a courtesy copy of the Complaint at Law was Sunday, September 12, 2021. This Notice of Removal is timely filed because it is filed on the next day that is not a Saturday, Sunday, or legal holiday within thirty (30) days of August 13, 2021, the date on which Defendants' counsel first received a courtesy copy of the Complaint at Law via email from Plaintiff's counsel. Fed. R. Civ. P. 6(a)(1)(C).

III. BASIS FOR REMOVAL – DIVERSITY JURISDICTION

4. The United States District Court has original jurisdiction over this litigation filed in state court based on diversity of citizenship of the parties. This case may be removed from the Circuit Court of Cook County, State of Illinois, County Department, Law Division, to the United States District Court for the Northern District of Illinois – Eastern Division, pursuant to 28 U.S.C. § 1332 because it is a civil action between citizens of different states and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

5. Defendant David Erickson is a citizen and resident of Minnesota. (**Ex. 3**, Illinois Traffic Crash Report, p. 1.)

6. Defendant M.J. Electric, LLC is a limited liability company that is wholly owned by Quanta Services, Inc. Quanta Services, Inc. is incorporated in the State of Delaware, has its principal place of business in Houston, Texas, and is deemed to be a citizen of Delaware and Texas pursuant to 28 U.S.C. 1332(c)(1).

7. Plaintiff Kenneth Erickson is a citizen and resident of Illinois. (**Ex. 3**, Illinois Traffic Crash Report, p. 1.)

8. Plaintiff has demanded damages from Defendants in the amount of \$165,000.00 to compensate him for personal injuries which he claims are related to the subject motor vehicle accident. (**Ex. 4**, Pre-Suit Demand from Plaintiff's Counsel.) The amount in controversy thus exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

9. This Court has diversity jurisdiction over this action pursuant to 28 U.S.C. §§ 1332 and 1441(a) because it is a civil action between citizens of different states and the amount in controversy exceeds \$75,000.00 exclusive of costs and interest.

IV. VENUE

10. The subject motor vehicle accident forming the basis for this action occurred in the City of New Lenox, County of Will, Illinois, making venue proper in the Northern District of Illinois – Eastern Division. (**Ex. 1**, ¶1, **Ex. 3**.)

V. FULL COMPLIANCE

11. Pursuant to 28 U.S.C. § 1446(d), Defendants are filing this Notice of Removal with the clerk for the state court in which the State Court Action was originally filed. Copies of the Notice to the Circuit Court of Cook County, State of Illinois, County Department, Law Division,

together with this Notice of Removal with exhibits, are being served upon the Plaintiff through his attorneys of record pursuant to 28 U.S.C. § 1446(d). Counsel who has appeared on behalf of the Plaintiffs in the state court action is:

Eric M. Glasson, Esq.
Michael E. Lapin, Esq.
Joshua M. Rappaport, Esq.
Eric M. Glasson & Associates
134 N. LaSalle Street, Suite 1320
Chicago, Illinois 60602
eric@glassonlawgroup.com
michael@glassonlawgroup.com
josh@glassonlawgroup.com
info@glassonlawgroup.com

WHEREFORE, Defendants, David Erickson and M.J. Electric, LLC, hereby remove the above-captioned action now pending against it in the Circuit Court of Cook County, State of Illinois, County Department, Law Division to the United States District Court for the Northern District of Illinois – Eastern Division to assume full jurisdiction over this action as provided by law.

Respectfully submitted,

McCOY LEAVITT LASKEY LLC

Attorneys for Defendants, David Erickson and M.J.
Electric, LLC

Dated: September 13, 2021

By: /s/ Michael A. Snider

Michael A. Snider ARDC No. 6337269
Riverwood Corporate Center III
N19 W24200 Riverwood Drive, #125
Waukesha, WI 53188
Telephone (262) 522-7000
Fax (262) 522-7020
msnider@MLLlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this document was served on the 13th day of September, 2021, upon all parties in the above cause by serving the attorneys of record at their respective addresses disclosed on the pleadings. Service was made by:

☒ U.S. Mail ☐ Hand-Delivery ☒ Email ☐ Facsimile ☒ Other – EDMS

Attorney for Plaintiff, Kenneth Barryhill

Eric M. Glasson, Esq.

Michael E. Lapin, Esq.

Joshua M. Rappaport, Esq.

Eric M. Glasson & Associates

134 N. LaSalle Street, Suite 1320

Chicago, Illinois 60602

eric@glassonlawgroup.com

michael@glassonlawgroup.com

josh@glassonlawgroup.com

info@glassonlawgroup.com

/s/ Michelle M. Neil _____

Michelle M. Neil, Legal Assistant

FILED
8/9/2021 1:47 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – LAW DIVISION**

KENNETH BERRYHILL,)
)
Plaintiff,)
)
v.)
)
DAVID ERICKSON, Individually and as)
Agent of M.J. ELECTRIC, LLC. and)
M.J. ELECTRIC, LLC.)
)
Defendant.)

Case No.: **2021L008021**

COMPLAINT AT LAW

NOW COMES the Plaintiff, KENNETH BERRYHILL, by and through his attorneys, Eric M. Glasson and Associates, and for his complaint against the Defendant, DAVID ERICKSON, Individually and as Agent of M.J. ELECTRIC, LLC., and M.J. ELECTRIC, LLC, states as follows:

**COUNT I: Negligence
KENNETH BERRYHILL Against DAVID ERICKSON**

1. On the morning of June 11, 2020, the Plaintiff, KENNETH BERRYHILL, was operating his motor vehicle in an eastbound direction on Haven Ave. at or near its intersection with Honey Lane in the City of New Lenox, County of Will, State of Illinois.
2. At said time and place, the Defendant, DAVID ERICKSON, was operating a motor vehicle in a northbound direction on a dirt road near the aforementioned intersection.
3. At all times relevant herein, it was the duty of the Defendant, DAVID ERICKSON, to exercise ordinary care in the operation, ownership, control, and maintenance of said vehicle, and in accordance with the statutes and common law of this state pertaining to the operation of a motor vehicle upon the public street, so as not to cause injury to the Plaintiffs and others.
4. Notwithstanding said duties, the Defendant, DAVID ERICKSON, was careless and negligent in one or more of the following ways:

- a. Negligently operated, managed, maintained, and controlled his motor vehicle;
- b. Failed to keep a proper lookout;
- c. Failed to reduce speed so as to avoid a collision, in violation of 625 ILCS 5/11-601;
- d. Failed to sound the horn or otherwise warn of impending danger of collision, in violation of 625 ILCS 5/12-601;
- e. Failed to yield the right of way to a vehicle on the roadway while entering said roadway;
- f. Entered the roadway when it was unsafe to do so;
- g. Operated a motor vehicle too fast for road conditions; and/or
- h. Failed to stop said motor vehicle or change the course of direction before striking the Plaintiff's vehicle.

5. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, the vehicle operated by the Defendant, DAVID ERICKSON, crashed into the Plaintiff, KENNETH BERRYHILL'S, vehicle, when Defendant entered the roadway from a dirt road.

6. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, DAVID ERICKSON, the Plaintiff, KENNETH BERRYHILL, sustained severe and permanent injuries, both externally and internally, and was and will be hindered and prevented from attending to his usual duties and affairs and has lost and will in the future lose the value of that time. The Plaintiff also suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff further expended and became liable for, and will expend and become liable to pay, large sums of money for medical care and services, endeavoring to become healed and cured of his injuries.

WHEREFORE, the Plaintiff, KENNETH BERRYHILL, demands judgment against the Defendant, DAVID ERICKSON, in a dollar amount to satisfy the jurisdiction and limitations of this

Court and such additional amounts as the jury and the Court shall deem proper, and additionally, costs of said suit.

COUNT II
VICARIOUS LIABILITY
KENNETH BERRYHILL AGAINST M.J. ELECTRIC, LLC.

1. Plaintiff reincorporates paragraphs 1-3 of “Count I” and reincorporates them by reference as if fully set out herein.

4. At all relevant times herein, the Defendant, DAVID ERICKSON, was acting as the agent, servant, and/or employee of the Defendant, M.J. ELECTRIC, LLC.

5. At all relevant times herein, it was the duty of the Defendant, M.J. ELECTRIC, LLC., by and through the acts and/or omissions of the Defendant, DAVID ERICKSON, to exercise ordinary care in the operation, ownership, control, and maintenance of the aforementioned motor vehicle, and in accordance with the statutes and common law of this state pertaining to the operation of a motor vehicle upon the public roadway, so as not to cause injury to the Plaintiff and others.

6. Notwithstanding said duties, the Defendant, M.J. ELECTRIC, LLC., by and through the actions of Defendant, DAVID ERICKSON, was careless and negligent in one or more of the following ways:

- a. Negligently operated, managed, maintained, and controlled his motor vehicle;
- b. Failed to keep a proper lookout;
- c. Failed to reduce speed so as to avoid a collision, in violation of 625 ILCS 5/11-601;
- d. Failed to sound the horn or otherwise warn of impending danger of collision, in violation of 625 ILCS 5/12-601;
- e. Failed to yield the right of way to a vehicle on the roadway while entering said roadway;
- f. Entered the roadway when it was unsafe to do so;
- g. Operated a motor vehicle too fast for road conditions; and/or

- h. Failed to stop said motor vehicle or change the course of direction before striking the Plaintiff's vehicle.

7. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, the vehicle operated by the Defendant, DAVID ERICKSON, crashed into the Plaintiff, KENNETH BERRYHILL'S, vehicle, when Defendant entered the roadway from a dirt road.

8. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, M.J. ELECTRIC, LLC., by and through the acts and/or omissions of the Defendant, DAVID ERICKSON, the Plaintiff, KENNETH BERRYHILL, sustained severe and permanent injuries, both externally and internally, and was and will be hindered and prevented from attending to his usual duties and affairs and has lost and will in the future lose the value of that time. The Plaintiff also suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff further expended and became liable for, and will expend and become liable to pay, large sums of money for medical care and services, endeavoring to become healed and cured of his injuries.

WHEREFORE, the Plaintiff, KENNETH BERRYHILL, demands a judgment against the Defendant, M.J. ELECTRIC, LLC., in a dollar amount to satisfy the jurisdiction and limitations of this Court and such additional amounts as the jury and the Court shall deem proper, and additionally, costs of said suit.

Respectfully Submitted,

By: /s/ *Eric Glasson*
Attorney for Plaintiff

Eric M. Glasson & Associates
Eric M. Glasson, Esq.
Michael E. Lapin, Esq.
Joshua M. Rappaport, Esq.
134 N. LaSalle Street, Suite 1320
Chicago, Illinois 60602
(312) 332-0400
Attorney#: 41088
info@glassonlawgroup.com

Rebecca A. Eder

From: Mike Lapin <michael@glassonlawgroup.com>
Sent: Friday, August 13, 2021 9:55 AM
To: Rebecca A. Eder
Subject: Berryhill
Attachments: Civil Action Cover Sheet Filed.pdf; Summons Issued And Returnable.pdf; 222 Affidavit Filed.pdf; Complaint / Petition - Motor Vehicle - Fee.pdf

Per your request, please see attached. Thanks!

From: GreenFiling Support <support@greenfiling.com>
Sent: Tuesday, August 10, 2021 9:52 AM
To: Information Mailbox <info@glassonlawgroup.com>
Subject: Filing ID 2698282 Accepted on 2021L008021 - BERRYHILL KENNETH VS. M.J. ELECTRIC, LLC



Accepted

Filing ID:	2698282								
Envelope No:	14360913								
Document(s):	Complaint / Petition - Motor Vehicle - Fee - Accepted 222 Affidavit Filed - Accepted Summons Issued And Returnable - Accepted Civil Action Cover Sheet Filed - Accepted								
Case:	2021L008021 - BERRYHILL KENNETH VS. M.J. ELECTRIC, LLC								
Court Location:	Cook County - Law - District 1 - Chicago								
Filer:	Eric Glasson								
Final Filing Fees:	<table><tbody><tr><td>Court Filing Fees</td><td>\$388.00</td></tr><tr><td>Provider Service Fee (GreenFiling)</td><td>\$1.00</td></tr><tr><td>Payment Service Fee</td><td>\$0.25</td></tr><tr><td>Total</td><td>\$389.25</td></tr></tbody></table>	Court Filing Fees	\$388.00	Provider Service Fee (GreenFiling)	\$1.00	Payment Service Fee	\$0.25	Total	\$389.25
Court Filing Fees	\$388.00								
Provider Service Fee (GreenFiling)	\$1.00								
Payment Service Fee	\$0.25								
Total	\$389.25								
Card Used:	CHECKING-xxxxxxxxxxxx5739								

[Click here](#) for a detailed printer friendly filing receipt.

[Click here](#) for a filing statement.

Thank you!

ILLINOIS TRAFFIC CRASH REPORT

Sheet 1 of 1 Sheets

DRAC U1	01	TRFD U2	01	TRFC U1	01	WEAT U2	01	DRVA U1	02	VIS U2	01	99	VEHD U1	99	U2	01	LGHT U1	01	COLL U2	10	MANV U1	03	U2	01
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AP002



X001928413

INVESTIGATING AGENCY New Lenox PD		DAMAGE TO ANY ONE PERSON'S VEHICLE/PROPERTY <input type="checkbox"/> \$500 OR LESS <input type="checkbox"/> \$501 - \$1,500 <input type="checkbox"/> Over \$1,500		TYPE OF REPORT <input type="checkbox"/> ON SCENE <input type="checkbox"/> NOT ON SCENE (DESK REPORT) <input type="checkbox"/> AMENDED		<input type="checkbox"/> A No Injury / Drive Away <input type="checkbox"/> B Injury and / or Tow Due To Crash		AGENCY CRASH REPORT NO. YR 2020 20-1207		TRFW 02	
ADDRESS NO.		HIGHWAY or STREET NAME W W HAVEN AVE		City NEW LENOX Township		INTERSECTION RELATED <input type="checkbox"/> Yes <input type="checkbox"/> No		DATE OF CRASH 06/11/2020 mo day yr		TIME 07:13 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	SECONDARY CRASH <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
(CIRCLE) 150 (CIRCLE) FT MI N E S W		(CIRCLE) HONEY LANE		COUNTY WILL		PRIVATE PROPERTY <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		DOORING WITH PEDALCYCLIST <input type="checkbox"/> Y <input checked="" type="checkbox"/> N		NUMBER MOTOR VEHICLES INVOLVED 2	
<input type="checkbox"/> AT INTERSECTION WITH		(NAME OF INTERSECTION OR ROAD FEATURE)		HIT & RUN <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		FLOW CONDITION <input type="checkbox"/> SLOW <input type="checkbox"/> STOPPED <input checked="" type="checkbox"/> FREE FLOW				# LNS 2	
<input checked="" type="checkbox"/> DRIVER <input type="checkbox"/> Parked <input type="checkbox"/> Driverless <input type="checkbox"/> Ped <input type="checkbox"/> Pedal <input type="checkbox"/> EQUUS <input type="checkbox"/> NMV <input type="checkbox"/> NCV <input type="checkbox"/> OV		DATE OF BIRTH 01/23/1981 mo day yr		MAKE DODGE		MODEL RAM 2500 ST		YEAR 2014		CIRCLE NUMBER(S) FOR DAMAGED AREA(S) 00 - NONE 13 - UNDER CARRIAGE 14 - TOTAL (ALL) 15 - OTHER 99 - UNKNOWN POINT OF FIRST CONTACT 12	
NAME (LAST, FIRST, MI) ERICKSON, DAVID, L		SEX M SAFT 2 AIR 04		AUTOMATED SYSTEM <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> UNK		LEV IN VEH		LEVEL ENGAGED AT CRASH		TOWED DUE TO CRASH <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
STREET ADDRESS 6019 165TH AVE		STATE MN ZIP 55308		INJURY 0 EJECT 1 EPTH 0		PLATE NO. RB18290		STATE IL YEAR 2020		FIRE <input type="checkbox"/> <input checked="" type="checkbox"/> DISTRACTED <input type="checkbox"/> <input checked="" type="checkbox"/> DISTRACIION VALUE COM VEH <input type="checkbox"/> <input checked="" type="checkbox"/>	
TELEPHONE (612) 723-7459		DRIVER LICENSE NO. Q807173624115		STATE MN CLASS CI CLD ID 7		VIN 3C6TR5CT0EG319107		INSURANCE CO. OLD REPUBLIC INSURANCE COMPANY		EXPIRED <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
EMS AGENCY		PEDV PPA PPL		VEHICLE OWNER (LAST, FIRST M.I.) M.J. ELECTRIC, LCC		POLICY NO. MWTB313092		TELEPHONE		VEHU 99	
HOSPITAL (TAKEN)		INCIDENT RESPONDER <input type="checkbox"/> Y <input checked="" type="checkbox"/> N		IF 'Y'		OWNER ADDRESS (STREET, CITY, STATE, ZIP) 200 W. FRANK PIPP DRIVE, IRON MOUNTAIN, MI 49801				U1	
<input checked="" type="checkbox"/> DRIVER <input type="checkbox"/> Parked <input type="checkbox"/> Driverless <input type="checkbox"/> Ped <input type="checkbox"/> Pedal <input type="checkbox"/> EQUUS <input type="checkbox"/> NMV <input type="checkbox"/> NCV <input type="checkbox"/> OV		DATE OF BIRTH 07/27/1960 mo day yr		MAKE FORD		MODEL EXPLORER		YEAR 1998		CIRCLE NUMBER(S) FOR DAMAGED AREA(S) 00 - NONE 13 - UNDER CARRIAGE 14 - TOTAL (ALL) 15 - OTHER 99 - UNKNOWN POINT OF FIRST CONTACT 05	
NAME (LAST, FIRST, MI) BERRYHILL, KENNETH, E		SEX M SAFT 2 AIR 04		AUTOMATED SYSTEM <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> UNK		LEV IN VEH		LEVEL ENGAGED AT CRASH		TOWED DUE TO CRASH <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
STREET ADDRESS 1401 WENTWORTH AVE		STATE IL ZIP 60409		INJURY 0 EJECT 1 EPTH 0		PLATE NO. BA52777		STATE IL YEAR		FIRE <input type="checkbox"/> <input checked="" type="checkbox"/> DISTRACTED <input type="checkbox"/> <input checked="" type="checkbox"/> DISTRACIION VALUE COM VEH <input type="checkbox"/> <input checked="" type="checkbox"/>	
TELEPHONE (312) 856-7921		DRIVER LICENSE NO. B640-5056-0213		STATE IL CLASS CI CLD ID 0		VIN 1FMZU34E8WUA65825		INSURANCE CO. STATE FARM GENERAL INSURANCE COMPANY		EXPIRED <input type="checkbox"/> Y <input checked="" type="checkbox"/> N	
EMS AGENCY		PEDV PPA PPL		VEHICLE OWNER (LAST, FIRST M.I.) BERRYHILL, KENNETH, E		POLICY NO. E97 3443-B03-13A		TELEPHONE (312) 856-7921		RDEF 01	
HOSPITAL (TAKEN TO)		INCIDENT RESPONDER <input type="checkbox"/> Y <input checked="" type="checkbox"/> N		IF 'Y'		OWNER ADDRESS (STREET, CITY, STATE, ZIP) 1401 WENTWORTH AVE, CALUMET CITY, IL 60409				BAC 996	
(UNIT) (SEAT) (DOB) (SEX) (SAFT) (AIR) (INJ) (EJECT) (EPTH)		PASSENGERS & WITNESSES ONLY (NAME) / (ADDR) / (TEL)		(EMS)		(HOSP)				# OCCS 1	
(EVNO) (MOST) (EVNT) (LOC)		DAMAGED PROPERTY OWNER NAME		DAMAGED PROPERTY		POLICE NOTIFIED 06/11/2020		TIME 07:13 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM		DIRP 01	
1 <input checked="" type="checkbox"/> 11 1		PROPERTY OWNER ADDRESS		CITY STATE ZIP		PRIMARY CAUSE 02		SECONDARY CAUSE 99		U1	
2 <input type="checkbox"/>		ARREST NAME <input type="checkbox"/> Citations Issued <input type="checkbox"/> Pending		SECTION		CITATION NO.		EMS ARRIVED TIME <input type="checkbox"/> AM <input type="checkbox"/> PM		U2	
3 <input type="checkbox"/>		ARREST NAME <input type="checkbox"/> Citations Issued <input type="checkbox"/> Pending		SECTION		CITATION NO.		ROAD CLEARANCE TIME <input type="checkbox"/> AM <input type="checkbox"/> PM		U3	
1 <input checked="" type="checkbox"/> 11 1		OFFICER ID. 149		SIGNATURE BARTELS, RYAN		BEAT / DIST. NEW LENOX POLICE		SUPERVISOR ID. 149		SLMT 30	
2 <input type="checkbox"/>		COURT DATE		TIME <input type="checkbox"/> AM <input type="checkbox"/> PM		Workers Present? <input type="checkbox"/> Y <input checked="" type="checkbox"/> N				U1	
3 <input type="checkbox"/>										U2	

X001928413	DIAGRAM	<p style="text-align: center;">COMMERCIAL MOTOR VEHICLE (CMV)</p> <p style="text-align: center;">IF MORE THAN ONE CMV IS INVOLVED, USE SR 1050A ADDITIONAL UNITS FORMS.</p> <p>A CMV is defined as any motor vehicle used to transport passengers or property and:</p> <ol style="list-style-type: none"> 1. Has a weight rating of more than 10,000 pounds (example: truck or truck/trailer combination); or 2. Is used or designed to transport more than 15 passengers, including the driver (example: shuttle or charter bus); or 3. Is designed to carry 15 or fewer passengers and operated by a contract carrier transporting employees in the course of their employment (example: employee transporter - usually a van-type vehicle or passenger car); or 4. Is used or designed to transport between 9 and 15 passengers, including the driver, for direct compensation beyond 75 air miles from the driver's work reporting location (example: large van used for specific purpose); or 5. Is any vehicle used to transport any hazardous material (HAZMAT) that requires placarding (example: placards will be displayed on the vehicle). <p>CARRIER NAME _____</p> <p>ADDRESS _____</p> <p>CITY/STATE/ZIP _____</p> <p>Motor Carrier ID <input type="checkbox"/> Interstate <input type="checkbox"/> Intrastate <input type="checkbox"/> Not in Comm./Govt <input type="checkbox"/> Not in Comm./Others</p> <p>USDOT NO. _____ ILCC NO. _____</p> <p>Source of above info. <input type="checkbox"/> Side of Truck <input type="checkbox"/> Papers <input type="checkbox"/> Driver <input type="checkbox"/> Log Book</p> <p>GVWR/GCWR <10,000 10,000-26,000 >26,000</p> <p>Were HAZMAT placards displayed on the vehicle? <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>If yes, name on placard _____</p> <p>4-digit UN no. _____ 1-digit Hazard Class no. _____</p> <p>Did HAZMAT spill from the vehicle (do not consider fuel from the Vehicle's own tank)? <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK</p> <p>Did HAZMAT Regulations violation contribute to the crash? <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK</p> <p>Did Motor Carrier Safety Regulations (MCS) violation contribute to the crash? <input type="checkbox"/> Y <input type="checkbox"/> No <input type="checkbox"/> UNK</p> <p>Was a Driver/Vehicle Examination Report from completed?</p> <p>HAZMAT <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK Out of Service? <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>MCS <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> UNK Out of Service? <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>Form No. _____</p> <p>IDOT PERMIT NO. _____ WIDE LOAD? <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>TRAILER VIN 1 _____ TRAILER VIN 2 _____</p> <p>TRAILER WIDTH(S): 0-96" 97-102" >102"</p> <p>TRAILER 1 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>TRAILER 2 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>TRAILER LENGTH(S): 1 _____ ft TRAILER 2 _____ ft</p> <p>TOTAL VEHICLE LENGTH _____ ft NO. OF AXLES _____</p> <p>SELECT CODES FROM BACK COVER OF CRASH BOOKLET:</p> <p>VEHICLE CONFIGURATION _____</p> <p>CARGO BODY TYPE _____ LOAD TYPE _____</p>
<p>NARRATIVE (Refer to vehicle by Unit No.)</p> <p>In summary: Unit 1 was pulling out from a dirt path that leads onto Haven that is located between Fairfield and Honey Ln. Unit 1 was attempting to make a left-hand turn onto Haven from this pathway. Unit 2 was traveling eastbound on Haven and passed this dirt-pathway. Unit 1 pulled onto Haven but accidentally struck the rear passenger quarter panel of Unit 2 causing minor damage.</p> <p>No EMS was needed. No tow trucks needed. Information between parties exchanged.</p> <p>Nothing further.</p>		
<p>LOCAL USE ONLY</p>		
<p>U_COLOR White</p> <p>U_TOWED DUE TO <input type="checkbox"/> DISABLING DAMAGE <input checked="" type="checkbox"/> NOT DISABLING DAMAGE</p>	<p>U_COLOR Blue-Dark</p> <p>U_TOWED DUE TO <input type="checkbox"/> DISABLING DAMAGE <input checked="" type="checkbox"/> NOT DISABLING DAMAGE</p>	<p>U_Drug 1 000 U_Drug 2</p> <p>DAMAGE EXTENT TOWED BY/TO</p> <p>DAMAGE EXTENT TOWED BY/TO</p>

GLASSON LAW GROUP, LTD.

ATTORNEYS AT LAW

134 N. LaSalle St. Suite 1320

Chicago, IL 60602

Telephone: (312) 332-0400

Fax: (312) 332-0402

April 13, 2021

Via Email: Andrew.French@Helmsmantpa.com

Helmsman

PO Box 7214

London, KY 40742

Attn: Andrew French

RE: Our client: Kenneth Berryhill
Date of Accident: June 11, 2020
Claim no.: AB949-389522-01

Dear Mr. French:

As you know, we are the attorneys representing Kenneth Berryhill regarding an accident which occurred on June 11, 2020.

Enclosed please find copies of the medical records and itemized bills for treatment rendered to Kenneth Berryhill as follows:

Advanced Physical Medicine - \$12,888.00

Greater Chicago Anesthesia - \$4,080.00

Dr. Rabi - \$29,024.40

American Diagnostic - \$3,900.00

Plaintiff hereby demands \$165,000.00 to resolve this matter. Please respond to plaintiff demand within thirty (30) days.

Very truly yours,

/s/ Eric M. Glasson

Eric M. Glasson

EMG/jcm

Enclosures